

Summary of the Project		NSW EPA RFI EPA Ref: DOC24/662988 (28/08/24)	DA 350.1/2023
6 Sleigh Place, Wetherill Park NSW 2164			
<p>Increase from 29,500 tonnes per annum (tpa) to 65,000 tpa, by extending operating hours to 24/7, comprising:</p> <ul style="list-style-type: none"> Stormwater/GPT material: 64,000 tpa (30,500 tpa increase) Wood waste (sawdust): 1,000 tpa (input to aid processing). <p>Residuals analysis in accordance with EPL #20694 and EPA Waste Classification Guidelines, then:</p> <ul style="list-style-type: none"> Disposed to appropriate landfill GSW CT1 to beneficial reuse (in accordance with Classification & Resource Recovery Order if suitable) and; Treated and discharged to sewer in accordance with Sydney Water Trade Waste Agreement (TWA #38666). <p>➤ Mainstream Recycling has formally withdrawn the 4,000 tpa street sweeping waste component from its application (29 March 2024, refer NSW Planning Portal).</p> <p>No other changes to proposal or DA documentation required.</p>			
NSW EPA Request for Information 19/06/24	Mainstream response letter dated 27 July 2024	EPA current request for clarification & MR Response	
The maximum volume of waste to be stored on the premises at any one time.	No maximum storage with DA conditions or EPL #20694. However maximum storage of treated material stored on site is 1250 tonnes.	<p>Provide a break-down of volumes for ALL types of waste material that would be on site at any one time. Please also provide justification for these volumes. The purpose of this information is to establish a volume to include as authorised amount limit on the Licence.</p> <p>Mainstream Response:</p>	

		<ul style="list-style-type: none"> • Untreated waste: 62m3 (unloading pit #1) + 65.6 m3 (unloading bay #1) = 120m3 = 240 tonnes (assume 2t/m3). • Treated material 1250 tonnes. Generally less than 500 tonnes (assume 2.5t/m3). • Sawdust: used sparingly and only as required as an absorbent to aid processing. • Waste: small quantity of PET bottles, plastics, oversize bark etc. Stored in skip bin and transported off-site as required to appropriate facility.
Proposed maximum waste stockpile dimensions. These should also be indicated on the site plan.	<p><i>The unloading bay is 3.905m deep x 7.32 m wide, as shown on Attachment 2: Mainstream Wetherill Park - Site Plan_DA TR231123 Arch Plans, and Portal. Waste can also be discharged directly into the in-ground unloading bay (60m3 capacity).</i></p>	<p>B) Clarify the dimensions including width, length AND depth/height of the following areas indicated on the site plan: (MR response in bold)</p> <p>Unloading bay: 3.905m x 7.320m wide x 1.8m high. Volume = 62m3. Reference to in-ground is incorrect.</p> <ul style="list-style-type: none"> • Unloading pit #1: 3.905m x 5.568 wide x 2.4 m deep. Volume = 68.5m3. • Screened material bay: 5.460m x 6.836m wide x 3.0m high. Volume = 68.5m3. • Unloading pit #2: 3.319 x 3.708m wide x 1.8m deep. Volume = 22.15m3. • Screened stockpile bay #1: 12.340m wide x 4.198 deep x 3.0 high*. Volume = 155.4m3. Material spadeable but damp (no free liquid). • Screened stockpile bay #2: 4.780m wide x 4.198 deep x 3.0 high*. Volume = 60.1m3. <p>* Note that the internal partition wall between screened stockpile bays #3 & #4 can be moved, hence volumes in these bays vary. Volumes are approximate. Weight varies according to moisture content.</p> <p>C) Define what is a “bay” and a “pit” (e.g., below ground, enclosed or covered).</p>

		Bay is above ground, pit is below ground.
d) Details of how stockpile sizes will be managed, considering the increased input of waste.	Daily load-out in 19m semi-trailers (four per week). Can be supplemented with HRV (11.00m tipper) load-outs as required. Mainstream Recycling aim to minimise waste volumes held at the Facility to optimise housekeeping and operating flexibility.	<p>D) Clarify whether load-out is daily (7 times per week) or four times per week.</p> <p>Treated, screened material is stored temporarily under the trommel and in stockpile bay #3. When sufficient volume is accumulated, treated material stockpile is sampled and classified in accordance with NSW EPA sampling and classification guidelines by external specialist.</p> <p>Material from screened stockpile bay #3 then transported off-site to appropriately-licenced facility, generally multiple loads by the one truck over one-day. Truck net loads approximately 30-36tonne.</p> <p>“Overs” (plastic and PET bottles, larger pieces of bark and branches etc) are sometimes stored in Bay #2 until transport to landfill.</p> <p>For proposed amplification of Facility, throughput will approximately double. Hence the load will double from above, but same process to be followed. Based on this, the trac management assessment considered that four days a week of outloading would be required, and that this would result in no adverse impacts on the road network.</p> <p>E) Indicate the maximum stockpile height limit proposed for the premises.</p> <p>Maximum stockpile height is 3 metres.</p>
Waste for beneficial reuse (land application)		
g) Details of all RROs and RREs referred to in the EIS and supporting documentation need to be provided.	All waste is sampled, analysed and classified in accordance with NSW EPA Waste Classification Guidelines, and transported	F) The EPA notes that Mainstream submitted three applications for specific resource recovery orders and exemptions (RRO/RREs) between 2019 and 2021 for the land application of dewatered GPT waste. Explain why an RRO/RRE is no longer proposed or required.

	<p>to an appropriately-licenced Facility.</p> <p>A site-specific RRO/RRE is not proposed or required. Treated material, apart from water fraction and waste fraction (eg PET bottles, plastics) is generally transported off-site as GSW (CT1) to appropriately licenced facilities in accordance with market conditions.</p>	<p>It is understood that Mainstream Recycling between 2019 and 2021 was seeking a site-specific Exemption as part of the application for street sweeping waste. Treated material is now transported to an appropriately-licenced facility.</p> <p>G) Provide clarification on what “in accordance with market conditions” means in the context of this application.</p> <p>The waste is currently transported to Brandown, although Mainstream Recycling does not generally name the specific facility in the application, so that it cannot be interpreted that the application is solely based on this provider. Further, there are sometimes changes to market conditions eg pricing, or wet weather, traffic etc where it may be cost-effective to change provider to another appropriately-licenced facility.</p>
h) Clarification of the quality control measures for processed Gross Pollutant Trap (GPT) waste material outlined on page 7 of the Waste Management Plan (WMP). In this part of the WMP, Mainstream identifies a potential risk for the release of processed GPT material as “environmental pollution/site contamination” and states that the control measure identified for	<p>The referenced Waste Management Plan (EIS Appendix J, PLA-TDG-011-01) was prepared in support of a previous modification seeking approval for street sweeper waste, which has since been withdrawn. A draft revision of this Waste Management Plan has been prepared (Attachment 4, PLA-TDG-MR-036-02 ver 2, July 2024), and would be revised should this proposal be approved and submitted in support of the EPA</p>	<p>H) At the time the applications were submitted for the RRO/RREs referred to above in F, the proposed reuse of dewatered GPT waste did not meet the minimum requirements for a resource recovery order and exemption, and was considered to be potential risk to the environment and/or human health. Mainstream must clearly demonstrate how the recovered material is suitable for beneficial reuse in landscaping activities.</p> <p>Mainstream Recycling has previously noted that the Waste Management Plan was prepared to support a previous modification. Since then, Mainstream has withdrawn its application to NSW EPA for acceptance of street sweeping waste. This Waste Management Plan (WMP) was provided as an example to demonstrate procedures and documentation only.</p> <p>As stated above, the treated material is classified and transported to an appropriately-licenced facility.</p>

<p>this risk is “analyte schedule & thresholds referencing current EPA Resource Recovery Orders & Exemptions”. Mainstream must provide a copy of the relevant RRO/RRE referred to in this section to allow the EPA to assess control measures.</p>	<p>Licence #20694 amendment application.</p>	<p>If the dewatered GPT waste is deemed suitable for beneficial reuse, describe in detail how this material is captured in the resource recovery framework (e.g., if it is waste captured under a general order, outline which order it relates to).</p> <p>As stated above, the treated material is classified and transported to an appropriately-licenced facility. The reference to land application was made prior to withdrawal of the application for street-sweeping waste. The referenced WMP has been superseded and is no longer relevant to the application or operation of the Facility.</p>
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